



October 23, 2018

VIA CERTIFIED MAIL

Carl Decina, Jr.
Agent for Service of Process
Decco Casting
1596 Pioneer Way
El Cajon CA 92020

<u>VIA CERTIFIED MAIL - RETURN RECEIPT</u> <u>REQUESTED</u>

OCT 29 2018

Wayne Christy Decco Casting 1596 Pioneer Way El Cajon CA 92020

> Re: <u>Clean Water Act Notice of Intent to Sue/60-Day Notice Letter</u> Decco Casting's Violations of General Industrial Permit

Dear Mr. Decina:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) and San Diego Coastkeeper (Coastkeeper) regarding Decco Casting Inc.'s (Decco Casting's) violations of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (General Industrial Permit).

This letter constitutes CERF and Coastkeeper's notice of intent to sue for violations of the Clean Water Act and General Industrial Permit for the Decco Casting facility located at 1596 Pioneer Way, El Cajon, California 92020 (Decco Facility or Facility), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of Decco Casting's Clean Water Act violations and CERF and Coastkeeper's intent to sue.

I. <u>Citizen Groups</u>

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and defense of the environment, the wildlife, and the natural resources of the California Coast. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024.

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Coastkeeper is a nonprofit organization committed to protecting and restoring the San Diego region's water quality and supply. A member of the international Waterkeeper Alliance, Coastkeeper's main purpose is to preserve, enhance, and protect San Diego's waterways, marine sanctuaries, coastal estuaries, wetlands, and bays from illegal dumping, hazardous spills, toxic discharges, and habitat degradation. Coastkeeper implements this mission through outreach, education, activism, participation in governmental hearings, and prosecuting litigation to ensure that San Diego's beaches, bays, coastal waters and tributary streams and rivers meet all substantive water quality standards guaranteed by Federal, State, and local statues and regulations. Coastkeeper's office is located at 2825 Dewey Road, Suite 207 in San Diego, California 92106.

Members of CERF and Coastkeeper use and enjoy the waters into which pollutants from Decco Casting's ongoing illegal activities are discharged, namely Forester Creek, the San Diego River, and eventually the Pacific Ocean (Receiving Waters). The public and members of CERF and Coastkeeper use these Receiving Waters to fish, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the Decco Facility affects and impairs each of these uses. Thus, the interests of CERF and Coastkeeper's members have been, are being, and will continue to be adversely affected by Decco Casting Owners and/or Operators' failure to comply with the Clean Water Act and the General Industrial Permit.

II. Storm Water Pollution and the General Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the General Industrial Permit in order to lawfully discharge.

The Decco Casting Owners and/or Operators conduct operations consisting of all activities required to produce aluminum casting products, including recycling operations and indoor and outdoor storage of industrial materials. Industrial materials stored on site include tools, compressed cylinders, castings, shipping boxes, recycled oil, dross bins, sand and sand chunks, and catalysts. (November 2016 SWPPP, Section 2.1.2.). The Facility SIC Code is 3365, Aluminum Foundries.

Decco Casting enrolled as a discharger subject to the General Industrial Permit on September 3, 1998 for its Facility located at 1596 Pioneer Way, El Cajon, CA 92020. Decco Casting submitted its most recent NOI for coverage under the New Industrial Permit on April 13, 2015, WDID Number 937I014542.

Pursuant to Section C(1) of the General Industrial Permit, a facility operator must comply with all conditions of the General Industrial Permit. (See New Industrial Permit, §I.A.8. [dischargers must "comply with all requirements, provisions, limitations, and prohibitions in this General Permit."]). Failure to comply with the General Industrial Permit is a Clean Water Act violation. (General Industrial Permit, § C.1; New Industrial Permit §XXI.A.). Any non-compliance further exposes an owner/operator to an (a) enforcement action; (b) General Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of a General Industrial Permit renewal application. As an enrollee, Decco

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Casting has a duty to comply with the General Industrial Permit and New Industrial Permit and is subject to all of the provisions therein.

B. Failure to Monitor and Report

The Decco Casting Owners and/or Operators have failed to report all monitoring data as required under the Industrial Permit and New Industrial Permit. Sections B(5) and (7) of the Industrial Permit requires dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Decco Casting Owners and/or Operators, were required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples were to be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility. Decco Casting did not sample any storm events from the 2011-2012 reporting period until the New Industrial Permit went into effect.

Under the New Industrial Permit, Decco Casting is required to sample all discharge points during two qualifying storm events (QSEs) in the first half of the reporting period, and two during the latter half. (New Industrial Permit, §XI.B.2). All monitoring data must be uploaded to SMARTS within 30 days of obtaining all results for each sampling event. (New Industrial Permit, §XI.B.11.a.).

Information available to CERF and Coastkeeper, including the Facility SWPPP and the SWPPP "Decco Draining Site Map" (SWPPP, p.67) (SWPPP map), indicates that there are at least two storm water discharge locations at the Facility. The Facility SWPPP at §2.1.4 describes the northwest discharge point as SP2 and the northeast discharge point as SP1, but the SWPPP map reverses this, labeling the northwest discharge point SP1 and the northeast discharge point SP2. Facility monitoring reports and SMARTs data are consistent with the SWPPP map orientation. Also, according to the stormwater flow arrows on the SWPPP map, there is another potential discharge point from the southwest corner of the site onto Cypress Lane. The Decco Casting Owners and/or Operators have failed to consistently sample and upload data to SMARTs for the two acknowledged discharge points for the required number of QSEs. (New Industrial Permit, §XI.B.4.). For example, during the January 5, 2017 QSE, Facility Owners and/or Operators failed to sample SP2. Multiple other monitoring reports from 2016 and 2017 indicate that Facility Owners and/or Operators only sampled one discharge point: Latitude 32.817534, Longitude -116.968159 on SMARTs, labeled "Bradley" in Facility monitoring reports, roughly corresponding to the location indicated for SP2 on the SWPPP map. Furthermore, the SWPPP acknowledges sheet flow runoff out of the northwest corner of the site, but then states that the only sampling location is at the northeast corner of the site: "[The East zone] contains the walkway where the majority of the Facility runoff occurs by sheet flow, an open area, and an underground pipe that flows from south to north toward the only drop inlet and sampling location (SP-1) of the site". (See SWPPP §2.1.4).

The Decco Casting Owners and/or Operators had numerous opportunities to sample but failed to do so. (See Exhibit A). Every day the Decco Casting Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing, and the Decco Casting Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. The Decco Casting Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of \$37,500 per day of violations prior

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to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

C. The Decco Facility Discharges Contaminated Storm Water in Violation of the General Industrial Permit

The Decco Casting Owners and/or Operators' monitoring reports indicate consistent exceedances and violations of the General Industrial Permit. Discharge Prohibition A(2) of the General Industrial Permit and New Industrial Permit Sections III.A-D prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance or violate any prohibitions in an applicable Basin Plan or statewide water quality control plan.

Effluent Limitation B(3) of the General Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of best management practices (BMPs) that achieve Best Available Technology Economically Achievable ("BAT") for toxic and non-conventional pollutants and Best Conventional Pollutant Control Technology ("BCT") for conventional pollutants. The New Permit includes the same effluent limitation. *See* 2015 Permit, Effluent Limitation V(A).

Information available to CERF and Coastkeeper, including via review of publicly available information and observations, indicates BMPs that achieve BAT/BCT have not been developed and/or implemented at the Facility. Consistent with CERF and Coastkeeper's review of available information and direct observations, the analytical results of storm water sampling at the Facility demonstrate that the Decco Casting Owners and/or Operators have failed and continue to fail to develop and/or implement BAT/BCT and achieve compliance with BAT/BCT standards, as required. Specifically, Facility discharges have exceeded EPA Benchmarks for numerous pollutants. EPA Benchmarks are relevant and objective standards for evaluating whether a permittee's BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the 1997 Permit and Effluent Limitation V(A) of the 2015 Permit.¹

Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges which cause or contribute to an exceedance of any water quality standards or applicable Basin Plan water quality standards. (See New Industrial Permit Receiving Water Limitations VI.A-C). In addition, Receiving Water Limitation VI.C. of the New Industrial Permit prohibits discharges that contain pollutants in quantities that threaten to cause pollution or a public nuisance.

The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard. (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving

¹ See United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) Authorization to Discharge Under the National Pollutant Discharge Elimination System, as modified effective February 26, 2009, Fact Sheet at 106; see also, 65 Federal Register 64839 (2000).

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Water Limitation C(2) when it 'causes or contributes to an exceedance of' such a standard, including the CTR." (*Id.* at 927).

If a discharger violates Water Quality Standards, the General Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards. (General Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(I)(C); New Industrial Permit, §XX.B.). The Decco Casting Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Facility's SWPPP pursuant to General Industrial Permit section (C)(3) and New Industrial Permit Section X.B.1.

As demonstrated by sample data submitted by Decco Casting, from enrollment through the present, the Decco Casting Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of water quality prohibitions and limitations during every significant rain event. The Decco Facility's sampling data reflects numerous discharge violations (see Exhibit B). Decco Casting's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

This data further demonstrates the Decco Facility continuously discharges contaminated storm water during rain events which have not been sampled.

D. Inadequate Storm Water Pollution Prevention Plan

One of the main requirements for the General Industrial Permit is the Storm Water Pollution Prevention Plan (SWPPP). (General Industrial Permit §A; New Industrial Permit §X.). Decco Casting has not developed an adequate SWPPP as required by the General Permit or New Industrial Permit, with many of the required elements noticeably absent from the Decco Facility SWPPP. (New Industrial Permit, §X.A.1-10).

The most recent Decco Casting SWPPP, dated November 2016, fails to adequately assess the Facility's potential contribution of pollutants for which the Receiving Waters (Forester Creek and the San Diego River) are impaired. Forester Creek is on the 303(d) list as impaired for fecal coliform, selenium, pH, and total dissolved solids (TDS). The Lower San Diego River is on the 303(d) list as impaired for enterococcus, fecal coliform, dissolved oxygen (DO) manganese, nitrate, nitrite, and total nitrogen, phosphorus, TDS, and toxicity. However, the Facility's latest SWPPP fails to acknowledge the Lower San Diego River's impairment for toxicity. According to the EPA's Industrial Stormwater Factsheet Series, Sector F Factsheet, toxicity is often associated with primary metals facilities like the Decco Facility.

The latest SWPPP also fails to account for the numerous and repeated violations identified by Decco Casting's monitoring data – ensuring these violations continue. The SWPPP is therefore inadequate. (See New Industrial Permit §I.E.37. ["Compliance with water quality standards may, in some cases, require Dischargers to implement controls that are more protective than controls implemented solely to comply with the technology-based requirements in this General Permit."]).

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Information available to CERF and Coastkeeper indicates that the Decco Casting Owners and/or Operators have not properly developed and/or implemented the required BMPs to address pollutant sources and contaminated discharges. Consequently, during rain events storm water carries pollutants from the Facility's sand materials storage area and other areas throughout the Facility into the storm sewer system, which flows into the Receiving Waters, in violation of the Storm Water permit.

Raw materials are stored outside without adequate cover or containment, resulting in discharges of polluted storm water and fugitive dust emissions. City of El Cajon and Regional Water Board Inspections have put Facility owners and/or operators on notice for years of the need to adequately cover materials stored outdoors and implement other required BMPs, but Facility owners and/or operators have consistently failed to revise their SWPPP, implement required BMPs, and undertake recommended and required corrections. For example, a June 14, 2014 BMP Compliance Report conducted by the City of El Cajon determined that minimum BMP requirements relating to "material storage outdoors" and "treatment controls-filters, etc" had not been met, and listed the following required corrective actions: "Adequately cover materials stored outside," and "Keep loading and unloading areas, including drains, free of debris." Similarly, a May 26, 2016 City of El Cajon inspection reiterated similar required corrective actions: "Adequately cover materials stored outside (sand molds area)", "Prevent run-on from contacting materials stored outdoors." On September 13, 2016, the San Diego Water Board inspected the Decco facility and issued a violation for deficient BMP implementation, again largely relating to the casting sand and sand chunk area at the northeast side of the facility. The resulting September 14, 2016 Staff Enforcement Letter to Decco addressing post-inspection required corrective actions stated that, "Secondary containment BMPs are deficient at the north east side of the facility, and there is exposure of process sand and sand chunks to storm water. In addition, there is a broken section of a wooden secondary containment wall that runs along the castings cooling and sand materials storage area at the northeast side of the facility where loose sand has discharged to the area next to a storm drain inlet...the deficiencies and violations noted in the photos (as marked with red arrows, circles, and/or notes in red) require corrective actions to bring your facility into compliance with specific IGP requirements." The attached photos and captions identified, inter alia, debris tracking northward under the perimeter fence; exposure of storm water to an overturned 55-gallon drum, casting sand, and sand chunks; loose sand adjacent to a storm drain inlet; and poly tarps deemed ineffective at covering the sand materials area during storm events. The captions recommended, inter alia, "installation of perimeter control BMPs", repair or replacement of wood barrier to prevent sand from discharging from containment area, and additional containment (berm/barrier) between storm drain and loose sand area." Photos from a subsequent June 19, 2017 City of El Cajon inspection show the sand materials storage area at the northeast side of the Facility still uncovered. Photos from an April 4, 2018 City of El Cajon inspection show uncovered bins, sand chunks littering the ground, sediment debris in an open storm drain, and Facility pavement covered with reddish-brown sediment. The April 4, 2018 inspection report rated the Facility's "level of cleanliness, BMP implementation, orderliness of site" at 2 out of 5. Coastkeeper and CERF member observations confirm lack of BMPs and storage of materials without adequate cover or containment at the Facility.

Every day the Decco Casting Owners and/or Operators operate the Facility without an adequate SWPPP is a separate and distinct violation of the General Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The Decco Casting Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit and New Industrial Permit since at least October 23, 2013. These violations are ongoing, and the Decco Casting Owners and/or Operators will continue to be in violation every day they fail provide an adequate SWPPP for the Facility. Thus, the Decco Casting Owners and/or Operators are liable for civil penalties of up to \$37,500 per day of

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violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Inadequate Level 1 and Level 2 ERA Reports

The Facility entered Level 1 status for oil and grease (O&G), zinc, and copper in 2016. The Facility entered Level 1 status for iron and aluminum and Level 2 status for zinc and copper in 2017. The Level 1 ERA Reports and the ERA Level 2 Report do not require additional filtration or other advanced BMPs. Rather, they rely on increased housekeeping, preventative maintenance, and source control BMPs. Because the Facility's Level 1 Technical Report for zinc and copper was inadequate, the Facility is now in Level 2 status for zinc and copper. Because the Facility's Level 2 Technical Report for zinc and copper was inadequate, the Facility has registered continued exceedances of zinc and copper in the 2017-2018 Reporting Year. Because the Facility's Level 1 Technical Report for iron and aluminum was inadequate, the Facility has registered continued exceedances of iron and aluminum in the 2017-2018 Reporting Year.

Every day the Decco Casting Owners and/or Operators fail to submit adequate Level 1 and Level 2 ERA Reports is a separate and distinct violation of the Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). These violations are ongoing, and the Decco Casting Owners and/or Operators will continue to be in violation every day they fail to revise and submit appropriate Level 1 and Level 2 ERA Reports.

III. Remedies

Upon expiration of the 60-day period, CERF and Coastkeeper will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF and Coastkeeper are willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF and Coastkeeper will move forward expeditiously with litigation.

Decco Casting must develop and implement an updated SWPPP, install BMPs to address the numerous and ongoing water quality violations, and implement a robust monitoring and reporting plan. Should the Decco Casting Owners and/or Operators fail to do so, CERF and Coastkeeper will file an action against Decco Casting for its prior, current, and anticipated violations of the Clean Water Act. CERF and Coastkeeper's action will seek all remedies available under the Clean Water Act § 1365(a)(d). CERF and Coastkeeper will seek the maximum penalty available under the law which is \$37,500 per day for violations prior to November 2, 2015, and \$51,570 per day for violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF and Coastkeeper may further seek a court order to prevent Decco Casting from discharging pollutants.

Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF and Coastkeeper will seek to recover all of their costs and fees pursuant to section 505(d).

IV. Conclusion

CERF and Coastkeeper have retained legal counsel to represent it in this matter. Please direct all

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communications to CERF and Coastkeeper's legal counsel:

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If you wish to pursue settlement discussions in the absence of litigation, please contact Coast Law Group LLP and San Diego Coastkeeper immediately.

Sincerely,

Matt O'Malley Josh Brooks

Attorneys for San Diego Coastkeeper

Marco Gonzalez

Livia Borak Beaudin

Attorneys for Coastal Environmental

Rights Foundation

SERVICE LIST

VIA U.S. MAIL

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		<u> </u>				PRCP
STATION	NAME	LATITUDE	LONGITUDE	ELEVATION	DATE	(inches)
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/9/2013	0.33
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/10/2013	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/28/2013	0.1
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/29/2013	0.18
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/30/2013	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/15/2013	0.02
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US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/20/2013	0.01
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US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/3/2014	0.18
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US1CASD0009 US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907 32.7907	-116.987 -116.987	221.6 221.6	3/27/2014 4/1/2014	0.08
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US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	8/3/2014	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/17/2014	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/31/2014	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/1/2014	0.41
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/2/2014	0.1
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/14/2014	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/21/2014	0.11
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/2/2014	0.52
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/3/2014	0.43
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/4/2014	0.48
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/7/2014	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/12/2014	0.81
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/13/2014	0.03

USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/15/2014 0.58 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/25/2014 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/25/2014 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/30/2014 0.16 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/31/2014 0.29 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/31/2014 0.29 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/26/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/31/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.3 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/28/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/28/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/1/2015 0.01 USICASD00							
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USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/31/2014 0.29 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/12/2015 0.09 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/26/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/26/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/26/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/22/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/2/2015 0.21 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/2/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/8/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/8/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/8/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/15/2015 0.06 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/15/2015 0.06 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/15/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/22/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/23/2015 0.03 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/32/2015 0.03 USICA	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/17/2014	0.45
USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.49 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/26/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/22/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/1/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/24/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/24/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/7/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/8/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/8/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/14/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/14/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/14/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/14/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/22/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/32/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/32/2015 0.01 USICASD000	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/25/2014	0.02
USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/12/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/26/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/26/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/29/2015 0.02 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 1/31/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/22/2015 0.13 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/23/2015 0.2 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 2/28/2015 0.3 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/2/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/2/2015 0.98 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 3/2/2015 0.91 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/23/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/24/2015 0.04 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/25/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 4/25/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/7/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 5/16/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 6/30/2015 0.07 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 6/30/2015 0.01 USICASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 6/30/2015 0.01 USICASD000	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/30/2014	0.16
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US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 10/17/2015 0.01 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 10/18/2015 0.02 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/2/2015 0.08 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/3/2015 0.66		EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6		0.28
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 10/18/2015 0.02 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/2/2015 0.08 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/3/2015 0.66			32.7907	-116.987	221.6	10/16/2015	0.02
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/2/2015 0.08 US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/3/2015 0.66	US1CASD0009		32.7907	-116.987	221.6	10/17/2015	0.01
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/3/2015 0.66	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/18/2015	0.02
			32.7907		221.6	11/2/2015	0.08
	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/3/2015	0.66
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/4/2015 0.01	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/4/2015	0.01
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/9/2015 0.01	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/9/2015	0.01
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/10/2015 0.08	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/10/2015	0.08
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/15/2015 0.03	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/15/2015	0.03
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/25/2015 0.12	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/25/2015	0.12
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/26/2015 0.05	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/26/2015	0.05
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 11/27/2015 0.15	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/27/2015	0.15
US1CASD0009 EL CAJON 1.5WSW, CA US 32.7907 -116.987 221.6 12/10/2015 0.01	US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/10/2015	0.01

LICACDOOOD	EL CALON A EWGW CALIG	22 7007	116.007	224.6	40/44/0045	0.24
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/11/2015	0.34
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/13/2015	0.18
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/19/2015	0.1
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/22/2015	0.7
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/23/2015	0.14
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/25/2015	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/28/2015	0.17
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/3/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/4/2016	0.27
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/5/2016	1.59
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/6/2016	1.08
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/7/2016	1.2
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/8/2016	0.09
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/9/2016	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/15/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/19/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/23/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/30/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/31/2016	0.47
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/1/2016	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/18/2016	0.05
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/5/2016	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/6/2016	0.25
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/7/2016	0.57
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/8/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/11/2016	0.25
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/14/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/29/2016	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/30/2016	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/7/2016	0.43
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/8/2016	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/9/2016	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/10/2016	0.28
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/30/2016	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/5/2016	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/6/2016	0.48
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/15/2016	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/25/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/28/2016	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/29/2016	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/30/2016	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/19/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/20/2016	0.32
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/21/2016	0.12
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/24/2016	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/30/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/20/2016	0.11
031CH3D0003	LL CAUCIA 1.344344, CA US	32.1301	-110.307	221.0	11/20/2010	0.11

US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/21/2016	0.27
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/26/2016	0.29
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/27/2016	0.28
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/28/2016	0.14
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/15/2016	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/16/2016	1.13
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/20/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/21/2016	0.49
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/22/2016	0.58
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/23/2016	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/24/2016	0.84
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/25/2016	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/30/2016	0.26
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/31/2016	0.91
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/1/2017	0.05
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/5/2017	0.17
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/9/2017	0.21
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/11/2017	0.12
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/12/2017	0.14
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/13/2017	0.61
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/14/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/18/2017	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/19/2017	0.72
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/20/2017	2.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/21/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/22/2017	0.58
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/23/2017	0.72
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/24/2017	0.07
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/6/2017	0.13
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/7/2017	0.27
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/11/2017	0.07
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/17/2017	0.97
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/18/2017	0.3
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/19/2017	0.13
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/26/2017	0.1
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/27/2017	3.43
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/28/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/5/2017	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/22/2017	0.09
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/6/2017	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/7/2017	1.23
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/8/2017	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/16/2017	0.05
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	8/28/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/3/2017	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/8/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	9/9/2017	0.01

Exhibit A. Precipitation Data

US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	10/20/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/17/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	11/27/2017	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	12/20/2017	0.07
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/8/2018	0.17
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/9/2018	2.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/10/2018	0.07
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	1/19/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/12/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/14/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/21/2018	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/22/2018	0.14
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/23/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	2/27/2018	0.61
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/3/2018	0.13
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/10/2018	0.57
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/13/2018	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/14/2018	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/15/2018	0.25
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/17/2018	0.27
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/18/2018	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/22/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	3/23/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/7/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/12/2018	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/19/2018	0.06
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	4/30/2018	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/1/2018	0.02
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/2/2018	0.12
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/12/2018	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/18/2018	0.01
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/21/2018	0.04
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/24/2018	0.03
US1CASD0009	EL CAJON 1.5WSW, CA US	32.7907	-116.987	221.6	5/30/2018	0.01

Decco Casting
Table of Exceedances

No.	Date	Monitoring Location Latitude	Monitoring Location Longitude	Parameter	Units	Result	Benchmark/ WQO	Magnitude of Exceedance	Benchmark/ NAL	Magnitude of Exceedance
1	1/7/2016	32.817534	-116.96816	Copper, Total	mg/L	0.1	0.013	7.69	0.0332	3.01
2	1/7/2016	32.817534	-116.96816	Copper, Total	mg/L	0.1	0.013	7.69	0.0332	3.01
3	1/7/2016	32.817534	-116.96816	Oil and Grease	mg/L	22.8	15	1.52	15	1.52
4	1/7/2016	32.817534	-116.96816	Oil and Grease	mg/L	22.8	15	1.52	15	1.52
5	1/7/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.27	0.12	2.25	0.26	1.04
6	1/7/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.27	0.12	2.25	0.26	1.04
7	3/7/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.36	0.12	3.00	0.26	1.38
8	5/6/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.54	0.12	4.50	0.26	2.08
9	11/21/2016	32.817534	-116.96816	Copper, Total	mg/L	0.5	0.013	38.46	0.0332	15.06
10	11/21/2016	32.817534	-116.96816	Zinc, Total	mg/L	2.26	0.12	18.83	0.26	8.69
11	12/16/2016	32.817534	-116.96816	Copper, Total	mg/L	0.047	0.013	3.62	0.0332	1.42

Decco Casting
Table of Exceedances

12	12/16/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.505	0.12	4.21	0.26	1.94
13	12/22/2016	32.817534	-116.96816	Aluminum, Total	mg/L	1.08	0.75	1.44	0.75	1.44
14	12/22/2016	32.817534	-116.96816	Copper, Total	mg/L	0.167	0.013	12.85	0.0332	5.03
15	12/22/2016	32.817534	-116.96816	Iron, Total	mg/L	1.24	1	1.24	1	1.24
16	12/22/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.26	0.12	2.17	0.26	1.00
17	12/30/2016	32.817534	-116.96816	Aluminum, Total	mg/L	1.09	0.75	1.45	0.75	1.45
18	12/30/2016	32.817534	-116.96816	Aluminum, Total	mg/L	2.86	0.75	3.81	0.75	3.81
19	12/30/2016	32.817534	-116.96816	Copper, Total	mg/L	0.163	0.013	12.54	0.0332	4.91
20	12/30/2016	32.817534	-116.96816	Copper, Total	mg/L	0.291	0.013	22.38	0.0332	8.77
21	12/30/2016	32.817534	-116.96816	Iron, Total	mg/L	1.25	1	1.25	1	1.25
22	12/30/2016	32.817534	-116.96816	Iron, Total	mg/L	3.3	1	3.30	1	3.30
23	12/30/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.373	0.12	3.11	0.26	1.43

Decco Casting
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24	12/30/2016	32.817534	-116.96816	Zinc, Total	mg/L	0.904	0.12	7.53	0.26	3.48
25	1/5/2017	32.817534	-116.96816	Aluminum, Total	mg/L	0.95	0.75	1.27	0.75	1.27
26	1/5/2017	32.817534	-116.96816	Aluminum, Total	mg/L	0.97	0.75	1.29	0.75	1.29
27	1/5/2017	32.817534	-116.96816	Copper, Total	mg/L	0.071	0.013	5.46	0.0332	2.14
28	1/5/2017	32.817534	-116.96816	Copper, Total	mg/L	0.078	0.013	6.00	0.0332	2.35
29	1/5/2017	32.817534	-116.96816	lron, Total	mg/L	1.02	1	1.02	1	1.02
30	1/5/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.491	0.12	4.09	0.26	1.89
31	1/5/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.292	0.12	2.43	0.26	1.12
32	1/19/2017	32.817534	-116.96816	Aluminum, Total	mg/L	2.15	0.75	2.87	0.75	2.87
33	1/19/2017	32.817534	-116.96816	Copper, Total	mg/L	0.069	0.013	5.31	0.0332	2.08
34	1/19/2017	32.817534	-116.96816	Copper, Total	mg/L	0.016	0.013	1.23	0.0332	
35	1/19/2017	32.817534	-116.96816	Copper, Total	mg/L	0.036	0.013	2.77	0.0332	1.08

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36	1/19/2017	32.817534	-116.96816	Iron, Total	mg/L	1.45	1	1.45	1	1.45
37	1/19/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.715	0.12	5.96	0.26	2.75
38	1/19/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.25	0.12	2.08	0.26	
39	1/19/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.22	0.12	1.83	0.26	
40	2/7/2017	32.817534	-116.96816	Aluminum, Total	mg/L	7.99	0.75	10.65	0.75	10.65
41	2/7/2017	32.817534	-116.96816	Copper, Total	mg/L	0.052	0.013	4.00	0.0332	1.57
42	2/7/2017	32.817534	-116.96816	Copper, Total	mg/L	0.366	0.013	28.15	0.0332	11.02
43	2/7/2017	32.817534	-116.96816	Copper, Total	mg/L	0.027	0.013	2.08	0.0332	
44	2/7/2017	32.817534	-116.96816	Iron, Total	mg/L	10.3	1	10.30	1	10.30
45	2/7/2017	32.817534	-116.96816	Total Suspended Solids (TSS)	mg/L	126	100	1.26	100	1.26
46	2/7/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.394	0.12	3.28	0.26	1.52
47	2/7/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.966	0.12	8.05	0.26	3.72

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48	2/7/2017	32.817534	-116.96816	Zinc, Total	mg/L	0.359	0.12	2.99	0.26	1.38
49	1/9/2018	32.817534	-116.96816	Aluminum, Total	mg/L	1.22	0.75	1.63	0.75	1.63
50	1/9/2018	32.817444	-116.96865	Aluminum, Total	mg/L	0.939	0.75	1.25	0.75	1.25
51	1/9/2018	32.817534	-116.96816	Copper, Total	mg/L	0.026	0.013	2.00	0.0332	
52	1/9/2018	32.817444	-116.96865	Copper, Total	mg/L	0.06	0.013	4.62	0.0332	1.81
53	1/9/2018	32.817444	-116.96865	Iron, Total	mg/L	1.02	1	1.02	1	1.02
54	1/9/2018	32.817534	-116.96816	Zinc, Total	mg/L	3.18	0.12	26.50	0.26	12.23
55	1/9/2018	32.817444	-116.96865	Zinc, Total	mg/L	1.5	0.12	12.50	0.26	5.77
56	1/9/2018	32.817534	-116.96816	рН	SU	6.4	Not < 6.5 or > 8.5	0.10	Not < 6.0 or > 9.0	
57	1/9/2018	32.817444	-116.96865	рН	SU	6.2	Not < 6.5 or > 8.5	0.30	Not < 6.0 or > 9.0	
58	2/27/2018	32.817444	-116.96865	Aluminum, Total	mg/L	2.1	0.75	2.80	0.75	2.80
59	2/27/2018	32.817534	-116.96816	Aluminum, Total	mg/L	2.2	0.75	2.93	0.75	2.93

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60	2/27/2018	32.817444	-116.96865	Copper, Total	mg/L	0.075	0.013	5.77	0.0332	2.26
61	2/27/2018	32.817534	-116.96816	Copper, Total	mg/L	0.029	0.013	2.23	0.0332	
62	2/27/2018	32.817444	-116.96865	Iron, Total	mg/L	3.14	1	3.14	1.	3.14
63	2/27/2018	32.817534	-116.96816	Iron, Total	mg/L	2.47	1	2.47	1	2.47
64	2/27/2018	32.817444	-116.96865	Zinc, Total	mg/L	0.54	0.12	4.50	0.26	2.08
65	2/27/2018	32.817534	-116.96816	Zinc, Total	mg/L	1.3	0.12	10.83	0.26	5.00